

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the matter of:)	
)	
Amendment of Part 97 of the)	RM-11305
Commission's Rules Governing the)	
Amateur Radio Service)	

Petition for Spectrum Deregulation in the Amateur Service

My name is James G. Gorman, Amateur Radio callsign WA0LYK, and I am a licensed amateur radio operator and a member of the American Radio Relay League. I have been active in amateur radio since 1964. I graduated from the University of Kansas in 1972 with a BSEE.

INTRODUCTION

The main fault with this petition is that the petitioners attempt to make the case that since there are more potential phone users than all others, they deserve access to all frequencies in the HF bands. The petitioners do not explore the possibilities of limited expansion or even moving to the Region 2 band plan. Ultimately, their conclusion is simply illogical.

SUB-BAND ALLOCATIONS

Amateur band allocations have never been made based totally upon the usage of different modes. There are many areas that must be considered and usage is just one of them. This plan makes no assessment of how “opening” up the bands would benefit or harm all the different types of modes. One can not simply ignore that there will be adverse affects along with beneficial ones. The petition is totally deficient in this matter. Consequently, the petition should not be accepted by the FCC for further consideration.

INTERNATIONAL CONSEQUENCES

The petition is very deficient in assessing the international impacts of the petition. Allowing the US Amateur bands to be entirely open to any mode will dramatically impact the plans of other countries with which the US has treaties. The petition makes no rational conclusions about how International agreements should be handled should this petition be approved. The petition should not be accepted by

the FCC for further consideration.

INTERFERENCE MITIGATION

The petitioners deal at considerable length concerning the handling of intentional interference. However, they do not deal with the fact that this petition will increase dramatically the unintentional interference between incompatible operations. There are many weak signal operations such as QRP CW and the digital modes of PSK31, and OLIVIA. In many cases, operators operating SSB do not even hear conversations in these modes. Newer transceivers have excellent DSP processing capabilities that will automatically remove tones (CW) and noise (weak signal digital modes). In many cases the lower power stations are never heard when these capabilities are used.

The petitioners have not provided any techniques or procedures that will be used to mitigate these unintentional interference situations. The petitioners have not recognized that many Amateurs run low power due to RFI problems (not necessarily their own) or have weak signals because they must use compromise antennas. Simply deregulating the bands to allow any emission anywhere without even recognizing these issues makes the petition totally deficient. Consequently, the petition should not be accepted by the FCC for further consideration.

SUMMARY

Based on the lack of analysis of the complicated problems introduced by this petition, I can not support this petition and recommend that the petition be dismissed in whole. The Communications Think Tank should be directed to provide detailed information that allows one to critically analyze changes in any future petition concerning this matter.

I would like to thank the FCC for providing the opportunity to so easily place comments on this petition into the record.

James G. Gorman
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